

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION**

TYSON AND BILLY ARCHITECTS, PC	§	
Plaintiff,	§	
	§	
	§	CIVIL NO. 6:19-CV-00053-JDK-JDL
VS.	§	
	§	
	§	
KINGDOM PERSPECTIVES, G.P., LTD.	§	
JIM LAPORTE and JONATHAN PINO,	§	
Defendants.	§	
	§	
	§	
VS.	§	
	§	
	§	
CHAD ENCHEFF AND C&E GROUP, INC.	§	

DEFENDANT, KINGDOM PERSPECTIVES, G.P., LTD.’S
MOTION TO EXTEND DEADLINE TO SERVE THIRD PARTY COMPLAINT AGAINST
CHAD ENCHEFF AND C&E GROUP GENERAL CONTRACTORS INC.

Defendant, Kingdom Perspectives, G.P., Ltd. (“Kingdom Perspectives”), hereby files its Motion to Extend the Deadline in which to serve its Third Party Complaint against Chad Encheff (“Encheff”) and C&E Group, Inc. (“C&E Group”) as party Defendants, pursuant to Federal Rule of Civil Procedure 14 as follows:

I. DEADLINE TO SERVE ENCHEFF/C&E GROUP

Within the deadline set by the Court, Kingdom Perspectives has filed its Third Party Complaint against Encheff and C&E Group. However, in the Court’s order (Doc. 34), the Court set a deadline to serve Encheff and C&E Group, Inc. of April 29, 2019. While the best information available to Kingdom Perspectives is that Encheff is currently residing in Montgomery County, Texas, C&E Group is a Wisconsin corporation and Encheff filed a bankruptcy proceeding in the

Northern District of Illinois, which indicated an address in Loves Park, Illinois.¹ Third Party Plaintiff Kingdom Perspectives does not currently know Encheff's exact whereabouts.

II. REQUEST FOR EXTENSION

Kingdom Perspectives intends to diligently pursue service of the Complaint upon Encheff and C&E Group. Given the potential logistical issues in having the Third Party Defendants served within five (5) days, Kingdom Perspectives requests that the Court enter an Order permitting service upon Encheff and C&E Group within thirty (30) days of the date of filing of the Third Party Complaint, which is April 24, 2019. The requested deadline for service upon Third Party Defendants, Echeff and C&E Group is May 28, 2019, which takes into account the Memorial Day holiday.

III. CONCLUSION

Wherefore, Kingdom Perspectives prays that Kingdom Perspectives be permitted thirty (30) days to effectuate service upon Chad Encheff and C&E Group, Inc. as Third Party Defendants in this action and for such other and further relief to which it is justly entitled.

¹ See: Order Denying Discharge – In Re: Chad J. Encheff, Case No. 17-82636, IN the United States Bankruptcy Court, Northern District of Illinois, Western Division.

Respectfully submitted,

/s/ William S. Hommel, Jr.

William S. Hommel, Jr.

State Bar No. 09934250

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ATTORNEY FOR DEFENDANT
KINGDOM PERSPECTIVES, G.P., LTD.

CERTIFICATE OF CONFERENCE

I hereby certify that on April 26, 2019, I conferred with opposing counsel, Clint James regarding the relief requested herein and Plaintiff is unopposed to the Motion as presented.

/s/ William S. Hommel, Jr.

William S. Hommel, Jr.

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing has been served on all counsel of record on this the 29th day of April, 2019.

/s/ William S. Hommel, Jr.

William S. Hommel, Jr.